

Exhibit 14

In the U.S. District Court
District of Columbia

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:
Shabtai Scott Shatsky, et :
al :
:
v. :NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
-----X

February 11, 2013

DEPOSITION OF:

Chani Edri,

a witness, called by counsel pursuant to notice,
commencing at 2:10 p.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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1 your name.

2 A. Chani Yoffa Edri.

3 Q. Ms. Edri, have you ever been known by any
4 other names?

5 A. I used to be Friedman.

6 Q. Your last name used to be Friedman?

7 A. Yes.

8 Q. The way it works is I'll ask questions.
9 You'll give answers. Everything we say will be
10 taken down by Mr. Feuer, our court reporter. He'll
11 turn that into a transcript. You need to answer
12 audibly because he can't take down shakes of the
13 head and that sort of thing.

14 During the course of the day Mr. Steiner may
15 make an objection. If that happens please just wait
16 until he finishes speaking and then unless he
17 instructs you not to answer please go ahead and
18 answer the question.

19 A. Okay.

20 Q. During the course of the day I may ask a
21 question and you don't understand it. If that

1 Q. Where is it?

2 A. In Shomron, Samaria.

3 Q. Is that in what some people refer to as
4 the West Bank?

5 MR. STEINER: Objection.

6 THE WITNESS: I don't know.

7 BY MR. HILL:

8 Q. Do you know what the West Bank is? Are
9 you familiar with that term?

10 A. No.

11 Q. Is the area in which you reside area that
12 was controlled by Israel prior to 1967?

13 MR. STEINER: Objection.

14 THE WITNESS: What?

15 BY MR. HILL:

16 Q. Do you understand there was a war in 1967?

17 A. Yes.

18 Q. Do you understand that Israel took some
19 territory that it did not previously control?

20 A. Yes.

21 MR. STEINER: Objection.

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1 happens please let me know and I'll rephrase it so
2 you can understand it. Fair enough?

3 A. Yes.

4 Q. During the course of the day I may ask a
5 question and you know what the question is and you
6 know what the answer is.

7 I'd ask you to please wait for me to finish
8 speaking before you start speaking because it's very
9 hard for Mr. Feuer to take two of us talking at the
10 same time.

11 A. Okay.

12 Q. Is there any reason you won't be able to
13 give full and truthful testimony here today?

14 A. No.

15 Q. Are you taking any medication or anything
16 like that that would impair your ability to testify?

17 A. No.

18 Q. What's your current address?

19 A. I [REDACTED]

20 Q. In what city or town is that?

21 A. Kedumim.

1 BY MR. HILL:

2 Q. Is the area in which you currently live
3 part of the area that was taken by Israel in 1967?

4 MR. STEINER: Objection.

5 THE WITNESS: Yes.

6 BY MR. HILL:

7 Q. Is the area in which you live referred to
8 by some people as a settlement?

9 A. Yes.

10 Q. How long have you resided at that address?

11 A. Three years.

12 Q. Where did you live prior to that?

13 A. In [REDACTED]

14 Q. How long did you reside in [REDACTED]?

15 A. 23 years.

16 Q. Have you lived anywhere other than in
17 [REDACTED] and at the address you provided --

18 A. No.

19 Q. Did you live in [REDACTED] for a period of
20 time?

21 A. No.

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1 Q. What is your date of birth, ma'am?

2 A. [REDACTED] 1987.

3 Q. Who are your parents?

4 A. Bella Friedman, Reuven Friedman.

5 Q. Of what country or countries are you a
6 citizen?

7 A. Israel and the United States.

8 Q. How did you obtain your American
9 citizenship?

10 A. I don't know.

11 MR. STEINER: Objection.

12 BY MR. HILL:

13 Q. Do you have a Social Security number?

14 A. Yes.

15 Q. What is it?

16 A. I don't know.

17 Q. Have you ever paid any taxes to the
18 United States government?

19 A. No.

20 Q. On how many occasions have you been to the
21 United States prior to the trip that you are on now?

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1 A. I don't understand the question.

2 Q. Have you been to the United States before
3 coming here today?

4 A. Yes.

5 Q. How many times have you been to the U.S.
6 previously?

7 A. What's "previously"?

8 Q. How many times have you come to the
9 United States during the course of your life before
10 coming to this deposition?

11 A. I don't know.

12 Q. A few, many?

13 A. Many.

14 Q. Approximately how many?

15 A. I don't know.

16 Q. Have you ever lived in the United States?

17 A. No.

18 Q. Prior to coming here for these
19 examinations and depositions when was the last time
20 you had been to the United States?

21 A. Half a year ago.

1 Q. What were you doing here half a year ago?

2 A. I came for a visit and I did for my
3 daughter national -- to get her citizenship.

4 Q. You registered your daughter as an
5 American citizen?

6 A. Yes.

7 Q. Who were you visiting?

8 A. My aunt.

9 Q. Which aunt?

10 A. Her name?

11 Q. Yes, please.

12 A. Esti.

13 Q. Is that your mother's sister?

14 A. Yes.

15 Q. Prior to that visit when did you last
16 travel to the United States?

17 A. I think two years ago.

18 Q. What did you do on that visit?

19 A. I did for my son, I got for him
20 citizenship.

21 Q. Did you visit family on that trip?

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1 A. Yes.

2 Q. Who did you visit on that trip?

3 A. My aunt.

4 Q. Aunt Esti again?

5 A. Yes.

6 Q. Prior to those two visits when you were
7 getting citizenship for your children and visiting
8 your aunt, when was the prior time that you were in
9 the United States?

10 A. I don't remember.

11 Q. You were injured in a bombing that took
12 place in February of 2002, correct?

13 A. Yes.

14 Q. Had you been to the United States before
15 that event?

16 A. Yes.

17 Q. On how many occasions?

18 A. I don't know.

19 Q. Why did you come to the U.S. before the
20 bombing?

21 A. Family.

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1 Q. Could you estimate for me the number of
2 times you visited prior to that?

3 A. I didn't understand the question.

4 Q. What's your best estimate of how many
5 times you visited the United States before the
6 bombing in 2002?

7 A. I don't know.

8 Q. Since the bombing in 2002 you've told me
9 about two trips to the U.S. and you are here for
10 this one obviously.

11 How many other times do you think you have
12 been other than those three times?

13 A. I don't know.

14 Q. What's your best estimate of the number of
15 times you've been to the United States since 2002?

16 A. I don't know.

17 Q. Why did you obtain American citizenship
18 for your children?

19 A. Because I wanted -- because I have
20 citizenship.

21 Q. Do you have any intention to move to the

1 Q. Are you currently working?

2 A. Yes.

3 Q. Where do you work?

4 A. In Ariel University.

5 Q. Where is Ariel University located?

6 A. In Ariel.

7 Q. In Israel?

8 A. Yes.

9 Q. How long have you worked there?

10 A. Five months.

11 Q. What's your job there?

12 A. Secretary.

13 Q. Who is your boss?

14 A. The name?

15 Q. Please.

16 A. Professor Shapiro.

17 Q. What field does Professor Shapiro teach
18 in?

19 A. Health, medical.

20 Q. What is his or her first name?

21 A. Yair.

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1 United States?

2 A. I don't know.

3 Q. You are not presently planning to move to
4 the U.S., are you?

5 A. Right now, no. Later on, I don't know.

6 Q. Are you married?

7 A. Yes.

8 Q. What is your husband's name?

9 A. Moshe.

10 Q. What citizenship does your husband have?

11 A. Israeli.

12 Q. Have you applied for American citizenship
13 for your husband?

14 A. No.

15 Q. Why not?

16 MR. STEINER: Objection.

17 THE WITNESS: I don't know.

18 BY MR. HILL:

19 Q. Have you considered applying for U.S.
20 citizenship for your husband?

21 A. No.

1 Q. Where did you go to high school, ma'am?

2 A. Place?

3 Q. Yes, ma'am.

4 A. [REDACTED].

5 Q. Did you graduate from high school?

6 A. Yes.

7 Q. What year did you graduate?

8 A. 2005.

9 Q. Have you been to college?

10 A. Yes.

11 Q. Where did you go to college?

12 A. Ariel.

13 Q. When did you enroll at [REDACTED]?

14 A. 2007.

15 Q. Did you graduate from [REDACTED]?

16 A. Yes.

17 Q. What year was that?

18 A. 2010.

19 Q. What degree did you earn there?

20 A. BA.

21 Q. In what field?

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1 A. Social behavior.
 2 Q. Have you had any postgraduate course work?
 3 A. I don't understand the question.
 4 Q. Have you taken any classes since
 5 graduating from college?
 6 A. No.
 7 Q. Have you had any other studies other than
 8 college since high school?
 9 A. Yes.
 10 Q. Where was that?
 11 A. Where?
 12 Q. Where?
 13 A. In [REDACTED]
 14 Q. What kind of school did you go to in
 15 Kiryat Arba?
 16 A. I don't know.
 17 MR. STEINER: You want to say it in
 18 Hebrew?
 19 THE WITNESS: (Hebrew)
 20 MR. STEINER: Seminary.
 21 BY MR. HILL:

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1 Q. You went to a seminary in [REDACTED]?
 2 A. Yes.
 3 Q. How long were you enrolled in the
 4 seminary?
 5 A. A year.
 6 Q. Did that result in a degree or
 7 certification or anything like that?
 8 A. No.
 9 Q. Did you complete your studies there?
 10 A. Yes.
 11 Q. Any other schooling since high school that
 12 you haven't told me about yet?
 13 A. No.
 14 Q. Have you had any work since high school
 15 other than the position you are currently in at
 16 Ariel University?
 17 A. Yes.
 18 Q. Where else have you worked?
 19 A. [REDACTED]
 20 Q. What did you do there?
 21 A. Human Resources.

1 Q. What was the name of the company you
 2 worked for?
 3 A. Orcal.
 4 Q. What's the business at Orcal?
 5 A. Human resources.
 6 Q. Does it provide employees for other
 7 companies, is that what it does?
 8 A. I don't understand.
 9 Q. Tell me how Orcal makes money.
 10 A. It finds people jobs.
 11 Q. What job did you have at Orcal?
 12 A. To find people jobs.
 13 Q. Were you like a career placement counselor
 14 or something like that?
 15 A. Yes.
 16 Q. Since we don't have a translator here, you
 17 need to answer in English to the best of your
 18 ability.
 19 Mr. Steiner for legal reasons should not be
 20 talking to you in Hebrew. If you don't know the
 21 word in English, that's fine, just say you don't

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1 know.
 2 A. I don't know the word.
 3 Q. Describe what your day to day job
 4 activities were when you worked at Orcal.
 5 A. To call people that are looking for jobs
 6 and try to find a suitable job for their
 7 requirement.
 8 Q. How long did you work there?
 9 A. Half a year, maybe more.
 10 Q. What's your best estimate of how long you
 11 worked for [REDACTED]?
 12 A. I gave birth in the middle. I guess it
 13 adds up to about nine months maybe.
 14 Q. You worked there for a total of nine
 15 months but you were on leave for a while after your
 16 baby was born?
 17 A. Yes.
 18 Q. Did you have a job prior to that?
 19 A. Yes.
 20 Q. Where was that?
 21 A. [REDACTED]

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1 Q. What is the business of [REDACTED]?
 2 A. Jackets, they sell jackets.
 3 Q. What was your job there?
 4 A. I don't know how you say it.
 5 Q. That's okay. Was this like a retail store
 6 where you go in and buy a jacket?
 7 A. No.
 8 Q. This was a company that manufactured
 9 jackets?
 10 A. They brought in from China.
 11 Q. They imported jackets?
 12 A. Yes.
 13 Q. What was your day to day work at [REDACTED]
 14 [REDACTED] in like? What did you do?
 15 A. I made orders for stores and I got orders
 16 from private people.
 17 Q. How long did you work there?
 18 A. Couple of months.
 19 Q. Did you have a job prior to working at
 20 Joseph Kaufman?
 21 A. Yes.

1 job?
 2 A. Yes.
 3 Q. What was the name of the friend?
 4 A. M [REDACTED]
 5 Q. Do you know [REDACTED]'s last name?
 6 A. [REDACTED]
 7 Q. Do you know where he is today?
 8 A. I [REDACTED]
 9 Q. Does he still work at Initia?
 10 A. Yes.
 11 Q. You said this was a friend of your mom's,
 12 a boyfriend?
 13 A. Work.
 14 Q. A co-worker?
 15 A. Yes.
 16 Q. Prior to Initia did you have a job?
 17 A. No.
 18 Q. Initia was your first job?
 19 A. Yes.
 20 Q. Did you serve in the Army?
 21 A. No.

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1 Q. Where was that?
 2 A. [REDACTED]
 3 Q. What's the business of [REDACTED]?
 4 A. Medical products.
 5 Q. How long did you work there?
 6 A. It was like also a student job. Maybe
 7 three years.
 8 Q. What did do you for [REDACTED]?
 9 A. Secretary.
 10 Q. Does your mother also work in [REDACTED]?
 11 A. She worked in [REDACTED]x. It's not the same
 12 company but it's combined or something like that.
 13 Q. She worked for a company called [REDACTED]
 14 while you worked at [REDACTED]?
 15 A. I think so.
 16 Q. Did she help you get the job at [REDACTED]?
 17 A. No.
 18 Q. Do you think you got that job independent
 19 of your mom?
 20 A. Somebody that works with my mom.
 21 Q. A friend of your mom helped you get the

1 Q. Did you perform national service?
 2 A. Yes.
 3 Q. When was that?
 4 A. 2006.
 5 Q. Where did you do your service?
 6 A. Kfar Haroe.
 7 Q. What's that?
 8 A. Dormitory school for boys that come from
 9 not good homes.
 10 Q. How long did you work there?
 11 A. Three months.
 12 Q. Was three months what was required for
 13 your national service?
 14 A. No, I went to another place.
 15 Q. Did you reside in the dormitory while you
 16 were working there?
 17 A. What does that mean?
 18 Q. Did you live there?
 19 A. Yes.
 20 Q. In what city was that located?
 21 A. Kfar Rohi is the name of the place.

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1 Q. Does the dormitory have a name?
 2 A. I [REDACTED]
 3 Q. You completed your national service at
 4 another location?
 5 A. I [REDACTED]
 6 Q. What is [REDACTED]?
 7 A. They care for children that come from
 8 homes that – I don't know.
 9 Q. These are children that are no longer
 10 living at home?
 11 A. They are living at home.
 12 Q. They are living at home but this is like a
 13 daytime facility they go to?
 14 A. Yes.
 15 Q. It's not a residential program?
 16 A. Right. For them, no.
 17 Q. Did you live in the facility while you
 18 were working there?
 19 A. I don't understand the question.
 20 Q. Where did you live while you were working
 21 at Bat Yam?

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1 A. I lived at home. While working I was in
 2 Tel Aviv.
 3 Q. You commuted from [REDACTED] to
 4 Tel Aviv to work?
 5 A. It's not like that.
 6 Q. Explain to me. How did you get to and
 7 from work?
 8 A. I lived at home. That period I had an
 9 apartment in Tel Aviv. I don't call that my home.
 10 Q. You did maintain an apartment in Tel Aviv
 11 while you worked at Bat Yam?
 12 A. Yes.
 13 Q. You considered yourself living at home
 14 with your mother?
 15 A. Right.
 16 Q. Approximately how long did you have that
 17 apartment in Tel Aviv?
 18 A. Until the end of the year.
 19 Q. Nine months?
 20 A. Yes.
 21 Q. Any other national service?

1 A. No.
 2 Q. Did you successfully complete your
 3 national service requirement?
 4 A. Yes.
 5 Q. Were you commended in any way for your
 6 work?
 7 A. Sorry?
 8 Q. Did you receive any awards, anything like
 9 that?
 10 A. I don't think so.
 11 Q. Have you ever received any negative
 12 feedback at work?
 13 A. No.
 14 Q. No one has ever told you you've done a
 15 poor job?
 16 A. No.
 17 Q. Ever been fired from a job?
 18 A. Yes.
 19 Q. Which job?
 20 A. Joseph.
 21 Q. Why were you fired from Joseph?

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1 A. Because they said they didn't have enough
 2 money.
 3 Q. Did the firing have anything to do with
 4 your performance?
 5 A. I don't understand.
 6 Q. Did the firing have anything to do with
 7 your job performance?
 8 A. What does "performance" mean?
 9 Q. Were you fired because you were doing your
 10 job badly?
 11 A. No.
 12 Q. Did anyone ever tell you you were fired
 13 because you were doing your job badly?
 14 A. No.
 15 Q. Have you ever been reprimanded at work in
 16 any way?
 17 A. What is that?
 18 Q. Have you ever been criticized for the way
 19 you were doing your work?
 20 A. What?
 21 Q. Has anyone ever told you you were doing a

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1 bad job at any of your jobs?
 2 A. No.
 3 Q. Did you get good grades in college?
 4 A. Not good.
 5 Q. What was your grade point average in
 6 college?
 7 A. 79.
 8 Q. Out of 100?
 9 A. Yes.
 10 Q. You did graduate, though, right?
 11 A. Yes.
 12 Q. Have you ever applied for a job you didn't
 13 get?
 14 A. Yes.
 15 Q. On how many occasions do you think?
 16 A. I don't know.
 17 Q. Have you ever not gotten a job you had
 18 applied for because of poor grades?
 19 A. No.
 20 Q. Has anyone ever given you a reason why you
 21 didn't get hired?

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1 A. Sorry?
 2 Q. Has anyone ever told you why you weren't
 3 hired at a job?
 4 A. No.
 5 Q. Are you satisfied with the job you have
 6 now?
 7 MR. STEINER: Objection.
 8 THE WITNESS: What was the question?
 9 BY MR. HILL:
 10 Q. Are you satisfied with the job you have
 11 now?
 12 MR. STEINER: Objection.
 13 THE WITNESS: Yes.
 14 BY MR. HILL:
 15 Q. Do you like your boss?
 16 A. Yes.
 17 Q. Are you content with your pay?
 18 A. I don't understand that.
 19 Q. Are you satisfied with the pay?
 20 A. What is "pay"?
 21 Q. The money you are being paid at your job,

1 are you satisfied with the money you are making?
 2 A. I guess.
 3 Q. When did you meet your husband?
 4 A. Can you say the question different? I
 5 don't understand.
 6 Q. I understand you are married, right?
 7 A. Yes.
 8 Q. When did you first meet your husband?
 9 A. A time?
 10 Q. Yes.
 11 A. In 2002.
 12 Q. Had you met him prior to the bombing of
 13 February 2002?
 14 A. Yes.
 15 Q. Was he present when you were injured in
 16 2002?
 17 A. Sorry?
 18 Q. Was he at the scene when you were injured
 19 in 2002?
 20 A. No.
 21 Q. Did he visit you in the hospital?

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1 A. Yes.
 2 Q. Were you and he dating at that time?
 3 A. What's dating?
 4 Q. Did you consider him to be a boyfriend at
 5 that time?
 6 A. No.
 7 Q. Did you have another boyfriend at the
 8 time?
 9 A. No.
 10 Q. He was just a friend at the time?
 11 A. Yes.
 12 Q. When would you first say that you and your
 13 husband started dating?
 14 A. I don't know.
 15 Q. Was it while you were still in high
 16 school?
 17 A. I don't know.
 18 Q. When were you engaged?
 19 A. 2007.
 20 Q. How long had you dated before you became
 21 engaged?

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1 A. I don't know. At the time it wasn't
 2 called dating so I don't know.
 3 Q. Were you in regular contact with your
 4 husband between 2002 and your engagement in 2007?
 5 A. Yes.
 6 Q. He lived in the same town that you lived
 7 in?
 8 A. No.
 9 Q. But you were in contact with him over the
 10 phone or e-mail or that sort of thing, right?
 11 A. Yes.
 12 Q. Did you have any boyfriends before your
 13 husband?
 14 A. No.
 15 Q. When were you married?
 16 A. January 10, 2008.
 17 Q. Do you have a happy marriage?
 18 MR. STEINER: Objection.
 19 THE WITNESS: Depends who looks at
 20 it, how you look at it.
 21 BY MR. HILL:

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1 Q. In your opinion is it a happy marriage?
 2 A. It could be better.
 3 Q. Are you considering divorce?
 4 A. No.
 5 Q. In what way could your marriage be better?
 6 MR. STEINER: Objection.
 7 THE WITNESS: I don't know.
 8 BY MR. HILL:
 9 Q. Have you and your husband ever considered
 10 getting divorced?
 11 A. No.
 12 Q. You have two children, right?
 13 A. Yes.
 14 Q. Are you happy with your children?
 15 A. Very.
 16 Q. Have you and your husband ever had any
 17 sort of marital counseling or anything like that?
 18 A. No.
 19 Q. Any difficulties in your marriage that you
 20 thought required help from outside the two of you?
 21 A. No.

1 Q. Any infidelity?
 2 A. What's that?
 3 Q. Has either of you cheated on the other?
 4 A. No.
 5 Q. Do you speak any languages other than
 6 English?
 7 A. Yes.
 8 Q. What other languages do you speak?
 9 A. Hebrew.
 10 Q. How long have you spoken Hebrew?
 11 A. My whole life.
 12 Q. How long have you spoken English?
 13 A. 26 years.
 14 Q. There have been a couple of occasions
 15 where you have told me you didn't understand my
 16 question.
 17 Is that because you are having difficulty
 18 understanding English?
 19 A. Your high words.
 20 Q. Some of the words I'm asking, you don't
 21 know what they mean?

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1 A. Right.
 2 Q. As I said at the beginning, if that
 3 happens again please let me know because otherwise
 4 everybody will assume that you do understand. If
 5 you don't, please let me know.
 6 A. Okay.
 7 Q. What are the names of your children?
 8 A. [REDACTED]
 9 Q. How old are they?
 10 A. [REDACTED]
 11 [REDACTED].
 12 Q. Are you planning to have more children?
 13 A. Yes.
 14 Q. Do you know where your father is currently
 15 living?
 16 A. Yes.
 17 Q. What is his address?
 18 A. [REDACTED]
 19 Q. Do you know the street address?
 20 A. [REDACTED]
 21 Q. Why did your parents get divorced?

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1 received in February 2002?

2 A. No.

3 Q. I'd like to ask you now about the events
4 of February 16, 2002.

5 I understand you were present at an
6 explosion that occurred that day in Karnei Shomron,
7 is that right?

8 A. Yes.

9 Q. Did you lose consciousness after that
10 explosion?

11 A. No.

12 MR. STEINER: Objection. I ask you
13 to be more specific about the timeframe after the
14 explosion.

15 BY MR. HILL:

16 Q. You eventually went to the hospital that
17 night, right?

18 A. Yes.

19 Q. Do you believe you were conscious between
20 the time of the explosion and the time that you got
21 to the hospital?

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1 A. Yes.

2 Q. Were you sedated at some point that
3 evening?

4 A. Sorry?

5 Q. Were you sedated at --

6 A. What's "sedated"?

7 Q. Were you given medicine that caused you to
8 pass out or fall asleep?

9 A. Yes.

10 Q. When did that happen?

11 A. I don't know.

12 Q. Was it at the hospital?

13 A. Yes.

14 Q. Did you see the person or persons who
15 caused the explosion before the explosion took
16 place?

17 A. Yes.

18 Q. How many persons were involved in causing
19 the explosion?

20 A. I don't know how many persons were
21 involved. I saw the person, one person that I saw.

1 Q. Had you ever seen this person before?

2 A. No.

3 Q. Are you able to tell me the name of the
4 person you saw who caused the explosion?

5 A. No.

6 Q. Has anyone ever asked you to identify the
7 person who caused the explosion?

8 A. No.

9 Q. Can you describe the person who caused the
10 explosion?

11 A. A dark man, dark colored man I guess you
12 could say, wearing dark clothing and he had a dark
13 jacket, he had a backpack.

14 Q. Can you tell me how tall this man was?

15 A. No.

16 Q. Can you tell me his approximate weight?

17 A. No.

18 Q. Can you tell me his hair color?

19 A. Dark.

20 Q. Can you tell me if he had any facial hair?

21 A. No.

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1 Q. Can you tell me if he was wearing glasses?

2 A. No.

3 Q. Have you now told me everything you can
4 about the physical description of this individual?

5 A. That I remember, yes.

6 Q. Did the person say anything?

7 A. No, not that I heard.

8 Q. You cannot recollect this person who
9 caused the explosion saying anything, correct?

10 A. Yes.

11 Q. How far were you from the person at the
12 time of the explosion?

13 A. I don't know.

14 Q. Was anyone near you at the time of the
15 explosion?

16 A. Yes. What does "near" mean?

17 Q. Within five feet of you.

18 A. What's five feet? Can you show me?

19 Q. Within two meters of you. Do you know
20 what two meters is?

21 A. I'm really bad at that stuff.

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1 Q. Was anyone sitting as close to you as you
2 and I are sitting now?

3 A. Yes.

4 Q. Who was within the radius that you and I
5 are currently?

6 A. Rachel Thaler.

7 Q. Anyone else?

8 A. Maya something.

9 MR. STEINER: Perhaps we should give
10 some sort of mention of how wide the table is.

11 MR. HILL: I'll do the examination.
12 That's fine.

13 BY MR. HILL:

14 Q. You were sitting at a table at the time
15 the explosion went off?

16 A. Yes.

17 Q. You mentioned that Rachel Thaler and Maya
18 were at the table with you?

19 A. Yes.

20 Q. Were they also seated?

21 A. Yes.

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1 Q. From which direction did the explosion
2 come?

3 A. The left.

4 Q. Ms. Thaler, was she seated on your left or
5 your right or across from you?

6 A. I think across. I'm not sure.

7 Q. You were sitting at a square table?

8 A. Yes.

9 Q. How many chairs were around the square
10 table?

11 A. Four.

12 Q. Your best recollection is that Ms. Thaler
13 was sitting across the table from you?

14 A. Yes, or across like that.

15 MR. STEINER: Diagonally.

16 THE WITNESS: It was four chairs. I
17 was sitting here. He came in from here and she was
18 here or here.

19 I don't remember. I think. Maybe she
20 was here. I don't remember.

21 MR. STEINER: Indicating he came from

1 her left and she was in front of where the witness
2 was sitting.

3 BY MR. HILL:

4 Q. Is it fair to say that you cannot
5 recollect whether Ms. Thaler was sitting across the
6 table from you or beside you at the table?

7 A. I think she wasn't beside me.

8 Q. She was across from you?

9 A. Across or like that.

10 Q. You believe Ms. Thaler was either sitting
11 on your left or directly across from you?

12 A. I don't think she was on my left.

13 Q. You believe she was sitting on your right?

14 A. No. I don't know how you say it in

15 English. Like that. There's across --

16 Q. Let's do this. I'm going to hand you a
17 blank sheet of paper. Would you draw a square
18 representing the table?

19 A. Yes.

20 Q. Would you draw four other squares
21 representing seats around the table?

1 A. Yes.

2 Q. Would you draw a C where you believe you
3 were sitting?

4 A. I think here. I think here or maybe here.

5 Q. Maybe you can put a C in both chairs where
6 you think you may have been seated.

7 A. Yes.

8 Q. You were seated in one or the other, you
9 just can't remember which one?

10 A. Yes.

11 Q. Can you draw an R in the chair that you
12 believe Rachel Thaler was seated in?

13 A. Yes.

14 Q. Can you draw an M where you think Maya was
15 seated?

16 A. Here, maybe here or here.

17 Q. Could you draw an X in the direction where
18 the blast came from?

19 A. I know that now. I didn't know that then.

20 Q. Are you saying that at the time of the
21 explosion you did not know from which direction the

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1 explosion came?

2 A. It came somewhere from here because I saw
3 him going here.

4 He came in from here. He went this
5 direction. I heard just boom, a big one.

6 Q. The table that you were sitting in was at
7 a restaurant, right?

8 A. Pizzeria.

9 Q. Were you closest to the exit or were you
10 closest to the back of the restaurant?

11 A. It's not a restaurant. It's not a closed
12 restaurant.

13 It's an open mall where there's a pizzeria
14 and there are nine tables. I was where you go out
15 to the street but there's different ways to go out
16 to the street because it's an open area.

17 Q. The table you were seated at was the
18 closest to the street, right?

19 A. Yes.

20 Q. When the bomb was detonated was the bomb
21 behind you in the pizzeria or was it out toward the

1 A. I saw him coming from my left.

2 Q. Were you injured more severely on your
3 left side than your right side?

4 A. What?

5 Q. I understand you had some hearing loss as
6 a result of this?

7 A. Yes.

8 Q. Which ear did you have the hearing loss
9 in?

10 A. My left.

11 Q. Are you able to say whether Rachel Thaler
12 was to the right of you or to the left of you?

13 A. I don't know.

14 Q. She was sitting across the table from you?

15 A. What I remember.

16 Q. She wasn't sitting beside you as
17 Mr. Steiner is sitting beside you now, right?

18 A. No, I don't think so. I don't remember.

19 Q. I understand that after the explosion
20 there was a period when it was silent, is that
21 right?

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1 street?

2 A. It was where I was sitting, the area of
3 the tables.

4 Q. The explosion occurred within the nine
5 tables that you've described?

6 A. Yes.

7 Q. Was the person sitting down at a table?

8 A. Which person?

9 Q. The person who caused the explosion.

10 A. I don't know.

11 Q. The explosion occurred --

12 A. I didn't see anything. I wasn't full
13 conscious.

14 I don't know what to tell you where he blew
15 himself up. I don't know.

16 Q. Do you know where the explosion took place
17 that night?

18 A. Somewhere where I was sitting. I saw
19 black.

20 Q. You said earlier that you believe it came
21 from your left.

1 A. What's that?

2 Q. How long did the period of silence last?

3 A. I don't know.

4 Q. But you do remember there being a silence
5 after the blast?

6 A. Yes.

7 Q. Then after the blast there was a lot of
8 yelling and screaming?

9 A. I don't remember hearing that.

10 I first remember hearing Rachel screaming.
11 I heard her screaming very, very loud and as I ran
12 out to the street I remember seeing a big mess and I
13 don't remember hearing things.

14 I don't know.

15 Q. There was a period of silence and then you
16 believe you heard Rachel Thaler screaming?

17 A. Yes.

18 Q. Were you able to see Rachel Thaler while
19 she was screaming?

20 A. No.

21 Q. From what direction was the screaming you

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1 were hearing coming from?

2 A. I don't remember.

3 Q. Maya was also sitting across the table
4 from you next to Rachel?

5 A. I don't remember. I don't know.

6 Q. Maya was also injured in this blast,
7 right?

8 A. Yes.

9 Q. What were the nature of her injuries?

10 A. I don't know.

11 Q. Do you know was Maya able to scream after
12 the blast?

13 A. I don't know.

14 Q. Do you know if you heard Maya screaming
15 after the blast?

16 A. I just remember hearing Rachel screaming.
17 I don't remember anything else.

18 Q. What makes you think it was Rachel that
19 you heard screaming as opposed to Maya or someone
20 else?

21 A. Because I know her voice. I've known her

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1 for a while.

2 Q. Was she saying words that you could
3 recognize?

4 A. Not that I remember.

5 Q. Had you heard her scream on prior
6 occasions?

7 A. Screaming maybe in laughter. I don't know
8 if in pain, no.

9 Q. Apart from your belief that it was her
10 voice because you were friends, is there anything
11 else that makes you think it was her as opposed to
12 someone else?

13 MR. STEINER: Objection.

14 THE WITNESS: I know my friend. I
15 know her voice.

16 BY MR. HILL:

17 Q. Is there anything else that makes you
18 think it was her as opposed to someone else that you
19 heard screaming that night?

20 MR. STEINER: Objection.

21 THE WITNESS: I don't remember

1 hearing anyone else screaming.

2 BY MR. HILL:

3 Q. Are you saying that you only heard one
4 person scream after the --

5 A. That's what I remember.

6 MR. STEINER: Objection.

7 THE WITNESS: I believe there was
8 more screaming but then I tried talking to her to
9 tell her to come with me but I don't remember
10 anything.

11 BY MR. HILL:

12 Q. After the blast when you heard screaming
13 you tried speaking to Rachel, right?

14 A. Yes. I wasn't able to. I tried talking.
15 It didn't come out.

16 Q. You remember trying to speak but you were
17 unable to speak?

18 A. Yes.

19 Q. Were you injured in your throat or mouth
20 in any fashion?

21 A. No.

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1 Q. Do you know why you were unable to speak
2 at that time?

3 A. No.

4 Q. Were you able to speak later that evening?

5 A. Yes.

6 Q. After the bomb went off did you see anyone
7 in the pizzeria?

8 A. No, I couldn't see anything.

9 Q. When do you recall being able to see after
10 the explosion the next time?

11 MR. STEINER: Objection.

12 THE WITNESS: When I ran out.

13 BY MR. HILL:

14 Q. Where did you run to?

15 A. I was trying to run home and cross the
16 street and the bus almost ran me over.

17 The bus driver came out and asked me what
18 happened. I pointed to him and told him there was
19 an attack and he told me to come up to the bus and I
20 asked him to please take me home to my address and I
21 was screaming because I started feeling very, very

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1 hot.

2 He took me to the ambulance station.

3 Q. Approximately how far did you walk or run
4 from the pizzeria to the point where you encountered
5 the bus as you've described it?6 A. I don't know how to tell you meters, feet,
7 I don't know.8 Q. Was it on the road in front of the
9 pizzeria where you encountered the bus?10 A. No. The bus was one road and another
11 road.12 Q. Were you approximately two blocks from the
13 pizzeria?

14 A. Not blocks, no. I don't know.

15 Q. You had walked or run some distance by the
16 time you --

17 A. It's not that far.

18 Q. Is it longer than the length of this room?

19 A. Yes.

20 Q. Approximately twice the length of this
21 room?

1 Q. Did they put you in an ambulance?

2 A. I think I went alone to the ambulance.

3 Q. Did the ambulance take you to a hospital?

4 A. Yes.

5 Q. Which hospital?

6 A. Schneider.

7 Q. Did you go to the emergency room at
8 Schneider?

9 A. I don't know.

10 Q. Do you have any gaps in your memory
11 anywhere between the time of the blast and the time
12 of your arrival at Schneider?

13 A. What?

14 Q. Are there any parts that you can't
15 remember between the time of the blast and the time
16 of your arrival at the Schneider Hospital?17 A. I remember being in an ambulance and I
18 remember hearing them talking, asking me questions.
19 I don't remember getting into the hospital. I
20 remember being in the hospital. I don't remember
21 getting in.

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1 A. I don't know.

2 Q. When you encountered the bus and the
3 driver stopped were you able to speak to the driver?

4 A. Yes.

5 Q. Did the driver give you aid?

6 A. What?

7 Q. Did he give you aid?

8 A. What is that?

9 Q. Did he help you?

10 A. I don't remember.

11 Q. You got on the bus?

12 A. Yes.

13 Q. Where did he take you?

14 A. The ambulance station.

15 Q. How far was that?

16 A. In ride?

17 Q. Yes.

18 A. I don't know. Three, four minutes.

19 Q. Once you got to the ambulance station were
20 there medical personnel there?

21 A. Yes.

1 Q. It's possible you may have lost
2 consciousness at some point in the ambulance?

3 A. I don't remember, I just can't remember.

4 Q. At some point you got to the hospital and
5 at that point they put you under and that sort of
6 thing?

7 MR. STEINER: Objection.

8 THE WITNESS: At some point. I don't
9 know.

10 BY MR. HILL:

11 Q. Can you describe generally the sort of
12 injuries you received in the bombing, from the
13 blast?14 A. That now I know? Then I didn't know
15 anything.

16 Q. That you know now, yes, ma'am.

17 A. Burned, shrapnel and my eardrum.

18 Q. Where were you --

19 A. The hole in my hand.

20 Q. Where were you burned?

21 A. On my feet, face -- foot, face, hand,

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1 Q. You are married, right?

2 A. Yes.

3 Q. You have two children?

4 A. Yes.

5 Q. Do you plan to have additional children?

6 A. I hope.

7 Q. Do you believe the fact that you were

8 injured in a bombing on February 16, 2002 has

9 affected your sex life with your husband?

10 A. I don't know.

11 Q. Are you able to tell me any way in which

12 the quality of your sex life has been affected by

13 the bombing of February 16, 2002?

14 A. No.

15 Q. Are you able to tell me in any way in

16 which the frequency of sexual relations with your

17 husband has been affected by the events of

18 February 16, 2002?

19 A. No.

20 Q. Sitting here today you cannot tell me any

21 way in which your sex life has been impacted by the

1 of a crime?

2 A. Yes.

3 Q. Let me show you what we marked as exhibit

4 22.

5 Is this the drawing you made earlier today

6 when we were discussing where people were sitting

7 around the table?

8 A. Yes.

9 MR. HILL: Subject to our request for

10 additional documents I do not have any further

11 questions for Ms. Edri at this time.

12 MR. STEINER: We reserve the right to

13 review and to sign.

14 Can I get a copy of 22?

15 MR. HILL: Yes.

16 MR. STEINER: Thank you.

17 MR. HILL: We're off the record.

18 (Deposition adjourned at 5:41 p.m.)

19

20

21

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1 events of February 16, 2002, is that correct?

2 A. No.

3 Q. Have you ever been arrested?

4 A. No.

5 Q. Have you ever been convicted of a crime?

6 A. No.

7 Q. Has anyone in your family ever been

8 arrested?

9 A. No.

10 Q. You are not aware of any arrests of any of

11 your family members, is that right?

12 A. Right.

13 Q. Has anyone in your family ever been

14 convicted of a crime?

15 A. I do not know.

16 Q. You are not aware of any criminal

17 convictions of any of your family members, is that

18 right?

19 A. Yes.

20 Q. You are agreeing with me? As far as you

21 know, no one in your family has ever been convicted

1 Reporter's Certificate

2

3 I, the undersigned, Certified Court Reporter,

4 do hereby certify that the foregoing transcript of

5 testimony was taken by me in stenotype and

6 thereafter reduced to print under my direction,

7 that said transcript is a full, true and

8 substantially accurate record of the proceedings,

9 to the best of my ability.

10 I do further certify that I am neither counsel

11 for, related to, nor employed by any of the parties

12 to the action in which this deposition was taken;

13 and, further, that I am not a relative or employee

14 of any attorney or counsel employed by the parties

15 hereto, nor financially or otherwise interested

16 in the outcome of the action.

17

18

19

20

21

/s/ Michael Feuer

Certified Realtime Reporter

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1 Certificate of Deponent

2 I hereby certify that I have read and
 3 examined the foregoing transcript, and the same
 4 is a true and accurate record of the testimony
 5 given by me.

6 Any additions or corrections that I feel
 7 are necessary I will attach on a separate sheet
 8 of paper to the original transcript.

9

10

11 _____
 Signature of witness

12 I hereby certify that the individual
 13 representing him/herself to be the above named
 14 individual, appeared before me this _____
 15 day of _____ and executed the above
 16 certificate in my presence.

17

18

19

20

21

 Notary Public

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1

2 Errata Page of Deponent

3 Please note any errors on this sheet. The
 4 reasons may be general, such as "to correct
 5 stenographic error" or "to clarify the record."
 6 When completed, send this page to the attorney
 7 who took your deposition, NOT the court reporter.

8 Page Line Correction Reason For Change

9

10

11

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21

Exhibit 15

NOT VALID UNTIL SIGNED

[illegible]

NOT VALID UNTIL SIGNED

[illegible]

Exhibit 16

The Secretary of State
of the United States of America

herby requests all whom it may concern to permit the citizen/
national of the United States named herein to pass
without delay or hindrance and in case of need to
give all lawful aid and protection.

*Le Secrétaire d'Etat
des Etats-Unis d'Amérique*

prie par les présentes toutes autorités compétentes de laisser passer
de citoyen ou ressortissant des Etats-Unis titulaire du présent passeport,
sans délai ni difficulté et, en cas de besoin, de lui accorder
toute aide et protection légitimes.

Steven L. Braun

SIGNATURE OF BEARER/SIGNATURE DU TITULAIRE

NOT VALID UNTIL SIGNED

UNITED STATES OF AMERICA

Type/Code Co. of issuing / code du pays
général USA
P
Surnom / Nom

P **Schilling / Nym**

1. BRAUN

STEVEN J

UNITED STATES OF AMERICA

et date de naissance

55
Lieu de naissance

ILLINOIS, U.S.A.
Date of issue:

Date of issue / Date de délivrance

28 FEB/FEV 00

: Authority / Autorité

U.S. EMBASSY

TEL AVIV, ISRAEL

Amendments
Modifications
SEE PAGE

[illegible]

USA5511145M1002274

Exhibit 17

In the U.S. District Court
District of Columbia

-----x
:
Shabtai Scott Shatsky, et :
al :
:
:
v. :NO. 1:02cv02280
:
The Syrian Arab Republic, :
et al :
:
-----x

February 5, 2013

DEPOSITION OF:

Steven Braun,

a witness, called by counsel pursuant to notice,
commencing at 9:14 a.m., which was taken at Miller
and Chevalier, 655 15th Street, NW, Washington, DC
20005-5701

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<p>1 A. I don't remember.</p> <p>2 Q. Did you work for them in 2008?</p> <p>3 A. Possibly. I don't remember the exact</p> <p>4 dates. I don't want to give you wrong information.</p> <p>5 Q. Give me your best guess.</p> <p>6 MR. STEINER: Don't guess.</p> <p>7 Objection. You don't want him to guess.</p> <p>8 MR. HILL: I'd like his best estimate</p> <p>9 that he worked for this company.</p> <p>10 BY MR. HILL:</p> <p>11 Q. What's your best estimate of the year you</p> <p>12 worked for this company?</p> <p>13 A. 2006, 2007.</p> <p>14 Q. How long did you work for Telecon?</p> <p>15 A. I think six or eight months.</p> <p>16 Q. Why did you leave that position?</p> <p>17 A. They couldn't pay me any more.</p> <p>18 Q. The business was failing?</p> <p>19 A. The business wasn't doing well when I</p> <p>20 joined the company.</p> <p>21 Q. What was your next employment after</p>	<p>1 you were being let go?</p> <p>2 A. No.</p> <p>3 Q. Did anyone tell you it was because of your</p> <p>4 job performance?</p> <p>5 A. No.</p> <p>6 Q. What was your next employment after Konika</p> <p>7 Minolta?</p> <p>8 A. Comfort Living.</p> <p>9 Q. What's the business of Comfort Living?</p> <p>10 A. Importing memory foam mattresses, sleeping</p> <p>11 pillows and medical cushions.</p> <p>12 Q. What was your position?</p> <p>13 A. I was owner, partner.</p> <p>14 Q. What was the name of your partner?</p> <p>15 A. Judah Wilbur.</p> <p>16 Q. Do you know where Mr. Wilbur resides</p> <p>17 today?</p> <p>18 A. Karnei Shomron.</p> <p>19 Q. Are you still in business with Mr. Wilbur</p> <p>20 today?</p> <p>21 A. No.</p>
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<p>1 Telecon?</p> <p>2 A. Konika Minolta.</p> <p>3 Q. What's the business of that company?</p> <p>4 A. Sell black and white and color digital</p> <p>5 copiers.</p> <p>6 Q. What was your position for Konika Minolta?</p> <p>7 A. Product marketing manager.</p> <p>8 Q. How long did you hold that position?</p> <p>9 A. I think two and a half years.</p> <p>10 Q. Approximately what years did you work for</p> <p>11 Konika Minolta?</p> <p>12 A. I think 2007, 2008. I'm not 100 percent</p> <p>13 positive.</p> <p>14 Q. Why did you leave Konika Minolta?</p> <p>15 A. I was let go.</p> <p>16 Q. Were you told why you were being let go?</p> <p>17 A. They let go a number of people, including</p> <p>18 myself. I wasn't told specifically. I thought I</p> <p>19 was doing a very good job. They were just trying to</p> <p>20 cut expenses.</p> <p>21 Q. Did anyone at Konika Minolta tell you why</p>	<p>1 Q. When did your business with him end?</p> <p>2 A. The end of 2010.</p> <p>3 Q. How did your partnership with Mr. Wilbur</p> <p>4 terminate?</p> <p>5 A. I wasn't getting along with him and I</p> <p>6 offered to buy his share of the business. He</p> <p>7 refused so I suggested he buy my share of the</p> <p>8 business.</p> <p>9 Q. Did he agree to buy you out?</p> <p>10 A. Yes.</p> <p>11 Q. When did he buy you out of that business?</p> <p>12 A. End of 2010.</p> <p>13 Q. Approximately how much money did you</p> <p>14 receive for that buy-out?</p> <p>15 A. 55,000 shekels.</p> <p>16 Q. Have you worked since that business ended,</p> <p>17 since your involvement in that business ended?</p> <p>18 A. Not regularly.</p> <p>19 Q. Tell me what work you've done since the</p> <p>20 buyout of the business.</p> <p>21 A. Worked as a guard at building sites,</p>

STEVEN BRAUN DEPOSITION

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<p>1 people doing renovations on their homes, delivering</p> <p>2 flowers, doing internet research, sourcing products</p> <p>3 for companies in China.</p> <p>4 Q. Have you been an employee of any company</p> <p>5 for any of the jobs you've just described?</p> <p>6 A. No.</p> <p>7 Q. So this has been independent contracting,</p> <p>8 so to speak?</p> <p>9 A. So to speak.</p> <p>10 Q. Are you currently working anywhere?</p> <p>11 A. No.</p> <p>12 Q. Are you currently looking for work?</p> <p>13 A. Yes.</p> <p>14 Q. How long have you been actively looking</p> <p>15 for work?</p> <p>16 A. Two years.</p> <p>17 Q. You are looking for a full time position</p> <p>18 but doing these things in the interim, is that fair</p> <p>19 to say?</p> <p>20 A. That is fair to say.</p> <p>21 Q. We're here today because you were injured</p>	<p>1 blood pressure prior to that date?</p> <p>2 A. No.</p> <p>3 Q. Had you ever been diagnosed as having high</p> <p>4 cholesterol prior to that date?</p> <p>5 A. No.</p> <p>6 Q. Were you on any regular medications as of</p> <p>7 February 16, 2002?</p> <p>8 A. No.</p> <p>9 Q. On February 16, 2002 did you see the</p> <p>10 person or persons who caused the explosion that day?</p> <p>11 A. No.</p> <p>12 Q. It's fair to say you are unable to</p> <p>13 identify the person or persons who caused the</p> <p>14 explosion, is that correct?</p> <p>15 MR. STEINER: Objection.</p> <p>16 THE WITNESS: I don't know what you</p> <p>17 mean by "identify."</p> <p>18 BY MR. HILL:</p> <p>19 Q. You can't say "this is the person that did</p> <p>20 it because I saw him on the scene that day,"</p> <p>21 correct?</p>
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<p>1 in a bombing that took place on February 16, 2002.</p> <p>2 I want to ask you some questions about what</p> <p>3 happened that day and about your health as a result</p> <p>4 of that.</p> <p>5 A. Okay.</p> <p>6 Q. Prior to that date, February 16, 2002, had</p> <p>7 you ever had any mental illness of any kind?</p> <p>8 A. No.</p> <p>9 Q. Had you ever been depressed prior to that</p> <p>10 date?</p> <p>11 A. No.</p> <p>12 Q. Had you ever seen any mental health</p> <p>13 professional prior to February 16, 2002?</p> <p>14 A. No.</p> <p>15 Q. Prior to February 16, 2002 did you have</p> <p>16 any health issues?</p> <p>17 A. No.</p> <p>18 Q. Did you have any hypertension prior to</p> <p>19 that date?</p> <p>20 A. Not that I was aware of.</p> <p>21 Q. You had not been diagnosed as having high</p>	<p>1 A. Correct.</p> <p>2 Q. Did you lose consciousness at the time of</p> <p>3 that explosion?</p> <p>4 A. No.</p> <p>5 Q. Can you describe for me what injuries you</p> <p>6 sustained in the explosion?</p> <p>7 A. I'll describe what I was doing leading up</p> <p>8 to the terrorist suicide bomber.</p> <p>9 Q. You are welcome to answer however you</p> <p>10 want.</p> <p>11 All I'm asking for is the nature of your</p> <p>12 injuries. If you'll tell me where you were struck</p> <p>13 and how you were injured, that's what the pending</p> <p>14 question is.</p> <p>15 A. I was standing almost in front of the</p> <p>16 jewelry store in the mall in Karnei Shomron. All of</p> <p>17 a sudden I heard the explosion.</p> <p>18 I saw blue, white flashing of light. I was</p> <p>19 pushed back from the force of the blast two or three</p> <p>20 steps and then I felt tremendous pain in my leg,</p> <p>21 excruciating pain.</p>

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<p>1 I looked down on my leg because I didn't</p> <p>2 know exactly -- I was in shock and I saw a lot of</p> <p>3 blood and guts on my pants leg. I thought it was my</p> <p>4 blood and guts.</p> <p>5 Again, I was in a lot of pain so I took my</p> <p>6 pants off to see if my leg was hanging from a</p> <p>7 thread. I had no idea because I was in a lot of</p> <p>8 pain.</p> <p>9 Then I realized it's not my blood and guts,</p> <p>10 it's probably the blood and guts of the suicide</p> <p>11 bomber and possibly other people that were murdered</p> <p>12 or injured in the attack, the terrorist attack.</p> <p>13 I saw that my leg around over here in my</p> <p>14 thigh was badly bruised. It was bleeding a little</p> <p>15 bit. I had some lacerations.</p> <p>16 MR. STEINER: Indicating proximal</p> <p>17 femur right side.</p> <p>18 BY MR. HILL:</p> <p>19 Q. Have you finished your answer?</p> <p>20 A. And then later on -- I'm just skipping now</p> <p>21 because I'm answering your question -- later on I</p>	<p>1 A. Both legs, yes.</p> <p>2 Q. Apart from your legs had you received any</p> <p>3 other injuries as a result of the blast?</p> <p>4 MR. STEINER: Objection.</p> <p>5 THE WITNESS: Those were the physical</p> <p>6 injuries.</p> <p>7 BY MR. HILL:</p> <p>8 Q. You weren't physically injured in your</p> <p>9 head, arms, upper torso?</p> <p>10 A. As far as I know, no.</p> <p>11 Q. On your legs the injuries were, I believe</p> <p>12 you were indicating your right thigh, is that</p> <p>13 correct?</p> <p>14 A. Right.</p> <p>15 Q. Did you receive any injuries below the</p> <p>16 knees on either leg?</p> <p>17 A. Not that I'm aware of.</p> <p>18 Q. Do you have any injuries to your hips or</p> <p>19 to your buttocks as a result of the blast?</p> <p>20 A. No.</p> <p>21 Q. You mentioned that you had some shrapnel</p>
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<p>1 was taken to the hospital, the emergency room, and</p> <p>2 the doctors examined my ears to see if I had damage</p> <p>3 in my eardrums.</p> <p>4 Apparently I didn't because I had a lot of</p> <p>5 wax in my ears and then they told me to take my</p> <p>6 pants off, they wanted to examine both my legs.</p> <p>7 I said it's just this leg. They said we</p> <p>8 have to examine it. I didn't really want to take my</p> <p>9 pants off. They said take your pants off or we'll</p> <p>10 take your pants off.</p> <p>11 I took my pants off and my other leg was</p> <p>12 injured also, also bruised, lacerations and</p> <p>13 shrapnel.</p> <p>14 They also X-rayed me to see if I had any</p> <p>15 internal damage from the blast. That was my</p> <p>16 physical, the extent of my physical injury.</p> <p>17 Q. Initially on the scene you realized you</p> <p>18 were wounded in your right leg, is that correct?</p> <p>19 A. Correct.</p> <p>20 Q. Then at the hospital you realized you had</p> <p>21 also been wounded in your left leg?</p>	<p>1 in your leg, is that correct?</p> <p>2 A. Correct.</p> <p>3 Q. Which leg did you have the shrapnel?</p> <p>4 A. Like some glass, stuff like that.</p> <p>5 Q. What do you mean by "blast stuff"?</p> <p>6 A. Glass.</p> <p>7 Q. You had some glass in both legs, is that</p> <p>8 correct?</p> <p>9 A. As far as I know. They cleaned it out.</p> <p>10 Q. Do you still have any shrapnel or glass in</p> <p>11 your body today?</p> <p>12 A. No, not that aware of.</p> <p>13 Q. Did you have any in your body after you</p> <p>14 left the hospital that night?</p> <p>15 A. As far as I know, no.</p> <p>16 Q. You were eventually transported to the</p> <p>17 hospital that day?</p> <p>18 A. That night, by ambulance.</p> <p>19 Q. Which hospital did you go to?</p> <p>20 A. Tel HaShomer.</p> <p>21 Q. Do you know the name of the doctor or</p>

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<p>1 MR. STEINER: Objection.</p> <p>2 THE WITNESS: Some jail outside of</p> <p>3 Haifa.</p> <p>4 BY MR. HILL:</p> <p>5 Q. How long were you in jail?</p> <p>6 A. 36 hours.</p> <p>7 Q. Were you released on bail or something?</p> <p>8 MR. STEINER: How long?</p> <p>9 THE WITNESS: 36 hours.</p> <p>10 BY MR. HILL:</p> <p>11 Q. You were released on bail or something</p> <p>12 like that?</p> <p>13 A. Something like that. Personal</p> <p>14 recognizance or something like that.</p> <p>15 Q. Apart from this have you had any other</p> <p>16 run-ins with the law?</p> <p>17 A. No.</p> <p>18 MR. HILL: I don't have any questions</p> <p>19 for Mr. Braun at this time, subject to our</p> <p>20 document --</p> <p>21 MR. STEINER: Did you have a copy of</p>	<p>1 Reporter's Certificate</p> <p>2</p> <p>3 I, the undersigned, Certified Court Reporter,</p> <p>4 do hereby certify that the foregoing transcript of</p> <p>5 testimony was taken by me in stenotype and</p> <p>6 thereafter reduced to print under my direction,</p> <p>7 that said transcript is a full, true and</p> <p>8 substantially accurate record of the proceedings,</p> <p>9 to the best of my ability.</p> <p>10 I do further certify that I am neither counsel</p> <p>11 for, related to, nor employed by any of the parties</p> <p>12 to the action in which this deposition was taken;</p> <p>13 and, further, that I am not a relative or employee</p> <p>14 of any attorney or counsel employed by the parties</p> <p>15 hereto, nor financially or otherwise interested</p> <p>16 in the outcome of the action.</p> <p>17</p> <p>18 /s/ Michael Feuer</p> <p>19</p> <p>20 _____</p> <p>21 Certified Realtime Reporter</p>
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<p>1 nine by any chance or we'll make that later?</p> <p>2 MR. HILL: I don't have it yet.</p> <p>3 We'll add it to the record.</p> <p>4 MR. STEINER: I ask for a copy of</p> <p>5 exhibit nine and we reserve our right to review and</p> <p>6 sign the transcript.</p> <p>7 (Deposition adjourned at 11:20 a.m.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p>1 Certificate of Deponent</p> <p>2 I hereby certify that I have read and</p> <p>3 examined the foregoing transcript, and the same</p> <p>4 is a true and accurate record of the testimony</p> <p>5 given by me.</p> <p>6 Any additions or corrections that I feel</p> <p>7 are necessary I will attach on a separate sheet</p> <p>8 of paper to the original transcript.</p> <p>9</p> <p>10 _____</p> <p>11 Signature of witness</p> <p>12 I hereby certify that the individual</p> <p>13 representing him/herself to be the above named</p> <p>14 individual, appeared before me this _____</p> <p>15 day of _____ and executed the above</p> <p>16 certificate in my presence.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 _____</p> <p>21 Notary Public</p>